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Attorney for: Santander Consumer USA Inc. dba Chrysler Capital
as servicer for CCAP Auto Lease Ltd.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)	
)	Case No. 23-16205 (CMG)
VINCENT VALENTI)	
)	Chapter 13
OLIVIA VALENTI)	
)	Hearing date: 10-4-2023
)	
)	
)	OBJECTION TO CONFIRMATION
)	
)	

Santander Consumer USA Inc. dba Chrysler Capital as
servicer for CCAP Auto Lease Ltd., the lessor of a motor
vehicle to the debtor, objects to the debtor's plan for the
following reasons:

- a. The debtor must assume the lease and pay all lease
payments directly to Santander Consumer USA Inc. dba
Chrysler Capital as servicer for CCAP Auto Lease Ltd. in
accordance with the terms of the lease and must either
immediately purchase the vehicle or surrender it at lease
end, and the plan must so provide.

- b. The vehicle must be insured with comprehensive and collision insurance coverage and liability coverage in accordance with the requirements contained in the lease.
- c. Prepetition lease arrears must be cured promptly and paid to Santander Consumer USA Inc. dba Chrysler Capital as servicer for CCAP Auto Lease Ltd. concurrently with or prior to payment of counsel fees, and in all events, prepetition arrears must be paid within 6 months of filing, OR before the lease terminates, whichever occurs first.
- d. Presently the plan **REJECTS THE LEASE AND/OR FAILS TO IDENTIFY THE LEASE.** If the lease is not assumed, the automatic stay and co-debtor stay will terminate at the conclusion of the confirmation hearing in accordance with 11 U.S.C. 365(p)(3).

/s/ William E. Craig, Esq.
William E. Craig, Esq. attorney
for Santander Consumer USA Inc.
dba Chrysler Capital as servicer
for CCAP Auto Lease Ltd.

Dated: 9-13-2023